

**IN THE UNITED STATES DISTRICT COURT
FOR THE NORTHERN DISTRICT OF ILLINOIS
EASTERN DIVISION**

*In re: Clearview AI, Inc. Consumer Privacy
Litigation*

Civil Action File No.: 1:21-cv-00135
Judge Sharon Johnson Coleman
Magistrate Judge Maria Valdez

**STIPULATION REGARDING FILING OF THIRD AMENDED CONSOLIDATED
CLASS ACTION COMPLAINT**

Defendants Clearview AI, Inc. (“Clearview”), Hoan Ton-That, Richard Schwartz, Rocky Mountain Data Analytics LLC (“Rocky Mountain”), and Thomas Mulcaire (collectively, the “Clearview Defendants”); and Defendants Macy’s, Inc., Macy’s Retail holdings, Inc. (n/k/a Macy’s Retail Holdings, LLC), and Macy’s Corporate Services, Inc (n/k/a Macy’s Corporate Services, LLC) (collectively, the “Macy’s Defendants”), by and through their respective counsel, hereby stipulate as follows:

1. Interim lead class counsel has provided a redlined draft of the Third Amended Consolidated Class Action Complaint to counsel for all Defendants.
2. Defendants’ counsel have reviewed the Third Amended Consolidated Class Action Complaint and consent to its filing pursuant to Federal Rule of Civil Procedure 15(a)(2).
3. Defendants further stipulate that the filing of the Third Amended Consolidated Class Action Complaint shall not operate as a dismissal of the claims of any individual who filed an action consolidated into *In re Clearview AI, Inc. Privacy Litigation*, U.S. Dist. Ct. N.D. Ill. No. 1:21-cv-00135.

WHEREFORE, the Clearview Defendants and the Macy's Defendants hereby stipulate to the filing of the Third Amended Consolidated Class Action Complaint.

Dated: May 14, 2024

Respectfully submitted:

By: /s/ James Thompson

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By: /s/ Daniel R. Saeedi

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Counsel for the Macy's Defendants

CERTIFICATE OF SERVICE

I, James Thompson, an attorney, hereby certify that, on May 14, 2024, I filed the foregoing document using the Court's CM/ECF system, which effected service on all counsel of record.

/s/ James Thompson
James Thompson